

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CRIM. NO. 04-30046-MAP

UNITED STATES OF AMERICA,

v.

PASQUALE ROMEO, ET AL  
Defendants

MOTION OF DEFENDANT PASQUALE ROMEO  
TO EXTEND STAY TO SELF-REPORT

The defendant herein requests that the date to report to a designated facility be stayed from January 5, 2007 to January 26, 2007 and in support hereof sets forth the following.

1. The location of defendant's place of incarceration has yet to be designated.
2. Prior requests for extension of stay have been allowed for that reason and because defendant's sister was mortally ill. She has since passed away.
3. Subsequent to her death, defendant began making serious attempts to obtain loans secured by property he and his wife own for the purpose of paying off his restitution as soon as possible and consistent with the Court's order that it be paid within 90 days of sentencing.
4. Bank of Western Massachusetts was willing to initially approve said loans with comfort that that they could be serviced by the rentals and the good history of rental income. The defendant has done business with that bank for years and is a valued customer. Yesterday, however, it was discovered by the bank that the government had placed liens on those properties. Said liens were recorded without notice to the defendant or counsel.
5. Counsel is trying to negotiate further with the bank and the government through its Financial Litigation Unit to secure said loans, satisfy and secure the release of the liens and satisfy the obligations of the defendant to pay restitution within the 90 days.
6. The necessary work to be completed to close on said loans will be significantly less onerous if it can be completed prior to defendant's incarceration.

7. Counsel has been made aware that offices of the federal government will be closed on Tuesday January 2, 2007.

WHEREFORE, defendant requests a further stay as set forth above.

THE DEFENDANT  
By His Attorney

/s/ Michael O. Jennings  
Michael O. Jennings, Esq.  
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CERTIFICATE OF SERVICE

I, Michael O. Jennings, hereby certify that I served a copy of the foregoing motion on all parties of record on August 18, 2006.

/s/ Michael O. Jennings  
Michael O. Jennings, Esq.